

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:) Chapter 11
)
W.R. GRACE & CO., et al.,) Case No. 01-1139 (JKF)
) Jointly Administered
Debtors.) Re: Docket Nos. 7502 and 7506

**DEBTORS' MOTION FOR LEAVE TO FILE A REPLY
IN FURTHER SUPPORT OF THEIR ESTIMATION SUPPLEMENT**

The above-captioned debtors and debtors in possession (collectively, the "Debtors") hereby request authority pursuant to Del.Bankr.LR 9006-1(d) to file a reply in further support of the *Debtors' Supplement to their Estimation Motion and Request for Related Relief* (Docket No. 7502), which is currently scheduled for hearing before the Court on January 21, 2005 at 9:00 a.m.

On January 7, 2005, the Official Committee of Asbestos Property Damage Claimants (the "PD Committee") filed *The Official Committee of Asbestos Property Damage Claimants to the Debtors' Supplement to their Estimation Motion and Request for Related Relief* (Docket No. 7506) (the "PD Objection"). The PD Objection contains several incorrect statements with respect to the ZAI Science Trial, the Debtors' position with respect to the ZAI Science Trial, and the scope and purpose of the proposed ZAI Bar Date. Given the importance of the ZAI Bar Date to the Debtors' reorganization efforts, the Debtors request an opportunity to file a reply that (i) clarifies the record with respect to the misstatements in the PD Objection and (ii) responds to certain of the PD Committee's arguments.

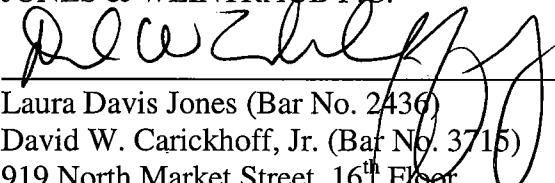
WHEREFORE, the Debtors respectfully request the entry of an Order granting it authority to file the reply, a copy of which is attached hereto as Exhibit 1.

Dated: January 14, 2005

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Co-Counsel for the Debtors and Debtors in
Possession

SO ORDERED this ____ day

of January, 2005

The Honorable Judith K. Fitzgerald
United States Bankruptcy Judge